

EXHIBIT A



Notice of Service of Process

null / ALL
Transmittal Number: 27209271
Date Processed: 07/03/2023

Primary Contact: Tracy Adair
AMERICAN AIRLINES, INC.
1 Skyview Dr
Md 8B503
Fort Worth, TX 76155-1801

Entity:	American Airlines, Inc. Entity ID Number 4333094
Entity Served:	American Airlines, Inc.
Title of Action:	Dawn Pecor vs. American Airlines, Inc.
Matter Name/ID:	Dawn Pecor vs. American Airlines, Inc. (14279666)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Charleston County Court of Common Pleas, SC
Case/Reference No:	2023-CP-10-03050
Jurisdiction Served:	South Carolina
Date Served on CSC:	06/29/2023
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	Hodge & Langley Law Firm 864-585-3873

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

Hodge & Langley
LAW FIRM

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LICENSED IN SOUTH CAROLINA, NORTH CAROLINA, AND GEORGIA

MATTHEW T. FOSS
MFoss@hodgelawfirm.com
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June 27, 2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7022 0410 0001 3611 4408

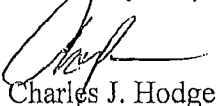
Corporation Service Company
508 Meeting Street
West Columbia, SC 29169

Re: **Dawn Pecor vs. American Airlines, Inc.**
CA No. 2023-CP-10-03050

Dear Sir or Madam:

Please find enclosed a Summons and Complaint, which has been filed in regards to the above referenced case and is being served upon you as registered agent for American Airlines, Inc.

Yours very truly,


Charles J. Hodge

CJH/tp

Enclosures

229 MAGNOLIA STREET • SPARTANBURG, SC 29306
P.O. Box 2765 • SPARTANBURG, SC 29304
TEL. (864) 585-3873 • FAX (864) 585-6485

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	
)	
Dawn Pecor,)	
)	SUMMONS
Plaintiff,)	
)	CA No.: 2023-CP-10-_____
vs.)	
)	JURY TRIAL DEMANDED
American Airlines, Inc.,)	
)	
Defendant.)	
_____)	

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is attached herewith served upon you, and to serve a copy of your answer to said Complaint on the subscribers at their office at Post Office Box 2765, 229 Magnolia Street, Spartanburg, South Carolina, 29304, within thirty (30) days after such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in this Complaint.

HODGE & LANGLEY LAW FIRM

s/Charles J. Hodge
Charles J. Hodge, SC Bar No. 2537
 Attorney for Plaintiff
 P.O. Box 2765
 Spartanburg, SC 29304
 Ph: (864) 585-3873
 Fax: (864) 585-6485

Dated: June 22, 2023
 Spartanburg, South Carolina

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	
)	
Dawn Pecor,)	
)	COMPLAINT
Plaintiff,)	
)	CA No.: 2023-CP-10-_____
vs.)	
)	JURY TRIAL DEMANDED
American Airlines, Inc.,)	
)	
Defendant.)	
_____)	

The Plaintiff, complaining of the Defendants, would respectively show unto this Court as follows:

PARTIES, JURISDICTION AND VENUE

1. Dawn Pecor ("the plaintiff") is a citizen and resident of Chittenden County, State of Vermont.
2. American Airlines is a Delaware corporation doing business in Charleston County, South Carolina, and in many other countries and states.
3. A substantial portion of the events giving rise to this action transpired in Charleston County, South Carolina.
4. Jurisdiction and venue are proper for the foregoing reasons.

FACTUAL BACKGROUND

5. The plaintiff incorporates the foregoing paragraphs as if repeated here, verbatim.
6. On July 14, 2022, the plaintiff was traveling on American Airlines flight number AA1440 from Philadelphia, Pennsylvania to Charleston, South Carolina.
7. At approximately 10:17 a.m., American Airlines flight AA1440 landed in Charleston, South Carolina. At the time of the landing touch-down impact, the Plaintiff heard a loud "bang" noise followed by sudden breaking, causing her to fly forward into the seats in front of her. As a result of the hard landing, Plaintiff has suffered severe pain in her spine, hip, and left leg.

8. As a direct and proximate result of the defendant's acts, the plaintiff has suffered severe and debilitating physical injuries and has incurred medical expenses, lost wages, emotional distress and will continue to incur medical expenses and experience severe suffering as a result of her injuries.
9. The plaintiff is therefore informed and believes she is entitled to judgment against the defendant.

FOR A FIRST CAUSE OF ACTION
(Negligence/Gross Negligence)

10. The plaintiff incorporates the foregoing paragraphs as if repeated here, verbatim.
11. The defendant owed certain duties to the plaintiff, including, but not limited to, the following:
 - a. to land in a manner which does not cause injury to passengers;
 - b. to provide a safe environment;
 - c. to provide appropriate flight services;
 - d. to properly inspect the plane;
 - e. to maintain the plane for proper functioning;
 - f. to implement proper safety rules;
 - g. to take reasonable precautions;
 - h. to operate the plane with a degree of care, caution and prudence;
 - i. to keep passengers free from harm;
 - j. to compensate the plaintiff for injuries and damages;
 - k. to hire competent employees/agents; and,
 - l. other duties as may be shown through discovery and at trial.
12. Breaches of the defendant's duties to the plaintiff constitute negligence, and in some cases recklessness.
13. The defendant negligently and recklessly breached their duty to the plaintiff in several ways, including one or more of the following:

- a. In landing the plane so abruptly as to cause injury to a belted passenger, namely the plaintiff;
 - b. In operating the plane in an unsafe manner and failing to provide a safe environment for the plaintiff;
 - c. In failing to implement appropriate safety procedures during the landing process;
 - d. In failing to properly inspect the plane and maintain the plane for proper functioning;
 - e. In failing to properly implement proper safety rules, develop proper safety culture concerning employee maintenance, selection and supervision;
 - f. In failing to take proper precautions to ensure that no unreasonably dangerous conditions existed with respect to the landing process for the subject flight;
 - g. In failing to operate the plane with the degree of care, caution, and prudence of a person with ordinary care, caution and prudence under the same or similar circumstances;
 - h. In failing to keep passengers free from harm;
 - i. In failing to compensate the plaintiff for injuries and damages;
 - j. In failing to hire competent employees/agents to operate the plane;
 - k. In such other ways as will be shown through discovery and at trial.
14. The acts of American Airlines as described above were negligent, grossly negligent, wanton and reckless.
15. As a direct and proximate result of the defendant's breaches, the plaintiff has been damaged.
16. Plaintiff is therefore entitled to recover from American Airlines damages to include medical expenses, permanent impairment, lost wages, lost earning capacity, lack of mobility, change in lifestyle, pain and suffering, emotional distress, mental anguish, loss of enjoyment of life, out of pocket expenses, other consequential damages, as well as punitive damages.
17. The plaintiff is therefore informed and believes she is entitled to judgment against the defendant for actual and punitive damages.

WHEREFORE, Plaintiff prays for judgment against the Defendant for actual, special, consequential, and punitive damages in an amount to be determined by the jury.

HODGE & LANGLEY LAW FIRM

s/Charles J. Hodge

Charles J. Hodge, SC Bar No. 2537

Attorney for Plaintiff

P.O. Box 2765

Spartanburg, SC 29304

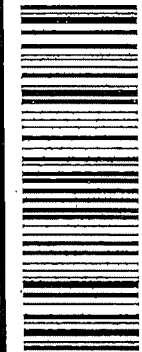
Ph: (864) 585-3873

Fax: (864) 585-6485

Dated: June 23, 2023
Spartanburg, South Carolina

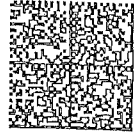
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FIRST CLASS MAIL

Hodge & Langley
LAW FIRM

229 Magnolia Street
P.O. Box 2765
Spartanburg, South Carolina 29304

Corporation Service Company
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West Columbia, SC 29169